

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**GUARDIAN INDUSTRIES
CORPORATION,**

Plaintiff,

V.

DELL, INC., et al.,

Defendants.

Civ. No. 05-027-SLR

DECLARATION OF JACK CHAO

1. I am an employee of TPV International (USA), Inc. ("TPVI") and I submit this Declaration on behalf of TPVI in support of the pure customer defendants' Motion to Stay the above-entitled action.

2. I have been continuously employed by TPVI since its incorporation on November 29, 2001, and am currently the President. As such, I am familiar with TPVI's business, which is the sale and marketing of computer monitors. Some of the products TPVI sells contain a Liquid Crystal Display ("LCD") panel. TPVI does not, and has never, designed or manufactured any LCD panels. Rather, TPVI purchases and sells finished products that incorporate LCD panels of third party suppliers and manufacturers.

3. I have reviewed the First Amended Complaint filed by plaintiff and, specifically, paragraph 43, which states, "On information and belief, Defendants each sell LCD product(s) that

include a version of Fuji Wide View (WV) film." However, TPVI does not know, and does not have a need to know, the technical details such as which films, if any, are contained in the LCD panels of the products it sells.

4. Pursuant to Section 1746 of Title 28 of the United States Code, I declare the foregoing to be true and correct under the penalties of perjury of the United States of America.

Dated: June 29, 2005

A handwritten signature in black ink, appearing to read "Jack Chao", written over a horizontal line.

Jack Chao

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2005 I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted.

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I hereby certify that on June 20, 2005 the foregoing documents were sent to the following non-registered participants in the manner indicated.

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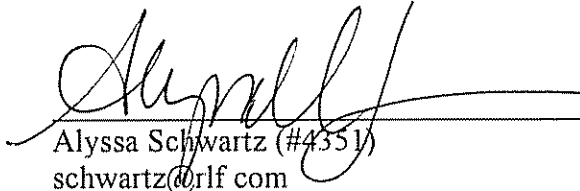
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